



FINAL ENVIRONMENTAL IMPACT STATEMENT

CONTINUED USE OF PUBLIC LANDS AT THE LUKE AIR FORCE RANGE, ARIZONA

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT



PREPARED BY
BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR
AND
DEPARTMENT OF THE AIR FORCE

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT

ARIZONA STATE OFFICE
2400 VALLEY BANK CENTER
PHOENIX, ARIZONA 85073

IN REPLY REFER TO

July, 1981

Enclosed is the final environmental impact statement for the proposed renewal of the Luke Air Force Range.

The statement is based on information from the U.S. Air Force, Bureau of Land Management, and other sources, including information supplied by and in consultation with Federal, State, and local agencies, and interested individuals and private organizations. The purpose of the statement is to disclose in advance the probable environmental impacts of the proposed action and its alternatives, and to assure that these factors are considered along with economic, technical, and other considerations in the decisionmaking process.

Since relatively few and minor changes are necessary, the draft statement and comments in this document constitute the final environmental statement. This revised procedure has saved substantial time, money, and paperwork. If you need a copy of the draft EIS please request it from the above address.

Thank you for your interest in this environmental statement.

Sincerely,

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United States Department of the Interior



UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

WASHINGTON, D. C. 20090

OFFICE OF THE ASSISTANT SECRETARY

FOR LAND MANAGEMENT

WASHINGTON, D. C. 20090

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LUKE
.34
FES

DEPARTMENT OF THE INTERIOR

Final
Environmental Impact Statement
(to be used with Draft)

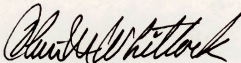
CONTINUED USE OF PUBLIC LANDS
AT THE LUKE AIR FORCE RANGE, ARIZONA

prepared by

BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR

and

DEPARTMENT OF THE AIR FORCE



STATE DIRECTOR, ARIZONA STATE OFFICE

Bureau of Land Management
Library
Bldg. 50, Denver Federal Center
Denver, CO 80225

SUMMARY

Draft Final (X) Environmental Statement

1. TYPE OF ACTION: Administrative () Legislative (X)
2. BRIEF DESCRIPTION OF ACTION: The United States Air Force has applied for a 20-year renewal of a 502,792-acre withdrawal on the Luke Air Force Range (LAFR) in Arizona. LAFR consists of 2,669,225 acres and includes the Cabeza Prieta National Wildlife Refuge (NWR), which is managed by the U.S. Fish and Wildlife Service. Associated with the proposed withdrawal is the plan of the Air Force and Marine Corps to upgrade target facilities and install telemetry equipment to improve aircrew training.

If the withdrawal is granted, the Air Force would continue operating the range under memorandums of understanding with the Department of the Interior and other Federal and State agencies.

3. SUMMARY OF ENVIRONMENTAL IMPACTS: Public use of and access to LAFR and the Cabeza Prieta NWR would continue to be restricted. Among the probable uses forgone on public land would be recreation, livestock grazing, and mineral exploration and development. Recreation would be forgone on the refuge.

Low-level overflight and sonic booms would detract from the wilderness experience of visitors to the national wildlife refuge, and tower target debris would detract from the refuge's visual resources.

Military activities have disturbed the surface on 9,500 acres; an additional 3,300 acres would be disturbed by construction and operation of the range. Adverse impacts would include soil disturbance or loss, vegetation removal, and loss of wildlife habitat. Altering 3,300 acres of habitat could result in some wildlife losses.

4. ALTERNATIVES CONSIDERED:
 1. No action.
 2. Reduce the size of the withdrawal.
 3. Establish a new range in another location.
5. COMMENTS HAVE BEEN REQUESTED FROM THE FOLLOWING:

- a. Federal Agencies

Department of the Interior
Fish and Wildlife Service
Geological Survey
Bureau of Mines
National Park Service
Heritage Conservation and Recreation Service
Bureau of Indian Affairs

Department of Agriculture
Soil Conservation Service

Department of Defense
Corps of Engineers
Marine Corps

Department of Housing and Urban Development

Environmental Protection Agency

Department of Transportation
Federal Aviation Administration

Department of Health and Human Services

Department of Energy

Advisory Council on Historic Preservation

- b. State of Arizona
Clearinghouse
Bureau of Mines
Historic Preservation Officer
Game and Fish Department
Office of Economic Planning and Development
- c. Counties
Maricopa
Pima
Yuma
- d. Municipalities
City of Yuma
Gila Bend
Town of Ajo
Town of Wellton
Town of Somerton
- e. Private and Public Interest Groups -- See chapter 9 for the complete list.

DATE STATEMENTS MADE AVAILABLE TO EPA AND THE PUBLIC: August 1980
July 1981

INTRODUCTION

The Luke Air Force Range Draft Environmental Statement (DEIS) was filed with the Environmental Protection Agency and released to the public on July 30, 1980. Notice of filing appeared in the Federal Register dated August 8, 1980. The public review period ended on October 6, 1980.

Comments received during the review period required only minor changes in the draft statement. To save time and money and reduce paperwork, the draft statement is incorporated by reference into the final environmental statement.

Approximately 500 draft statements were distributed for review. From this review a total of 24 comment letters were received and are summarized on the following table. These letters commenting on the adequacy, completeness, and accuracy of the statement are reproduced, with each substantive comment identified and numbered along with our responses.

An errata sheet identifies changes in the draft statement resulting from these comments and BLM's and U.S. Air Force's internal review.

SUMMARY OF RESPONSES RECEIVED

The following table lists letters received:		Page No.
1. Severo Esquivel, City Administrator, Yuma, Arizona.		4
2. Jim Hartdegen, State Representative, Arizona House of Representatives.		5
3. Clara M. Price, for Thomas Childs.		6
4. J.R. Vaughn, mining claim owner.		7-8
5. Arizona State Clearinghouse Planning Division		9
A. James R. Carter, Director, Agriculture and Horticulture Department.		
B. James H. McCutchins, State Mine Inspector.		
C. Tom Swanson, Executive Director, Pima Association of Governments.		
D. Les Ormsby, Admin., Arizona Power Authority.		
6. Thomas G. Rockenbaugh, State Conservationist, Soil Conservation Service.		10
7. U.S. Geological Survey, via phone.		11
8. Norman Arno, Chief, Engineering Division, Los Angeles District Corps of Engineers, Dept. of the Army.		11
9. Richard L. Morgan, Area Manager, Phoenix Area Office, U.S. Fish and Wildlife Service.		12
10. John S. Adams, Acting Associate Regional Director, Resource Management and Planning, National Park Service.		13
11. Gordon E. Moore, P.E. Chief, Engineering and Environmental Planning Branch, Davis-Monthan Air Force Base.		14
12. Dave Foreman, Member of the Circle EARTH FIRST.		15
13. Joe T. Fallini, Commissioner, Arizona State Land Department.		16
14. Phillip Childs, Rancher.		17-18
15. Kelly R. Johnson, Director, Division of Natural Resources, Arizona State Land Department.		19
16. Thomas G. Rockenbaugh, State Conservationist, Soil Conservation Service.		20

SUMMARY OF RESPONSES RECEIVED
(Continued)

	Page No.
17. Neil Dillabough, Director Office of Environment and Design, Federal Highway Administration, Region Nine.	21
18. William E. Werner, Habitat Evaluation Specialist, Yuma Regional Office, Arizona Game and Fish Department.	22-23
19. Barbara Goodwin, U.S. Bureau of Mines, via phone.	24
20. Bryan V. Cady, Jr.	24
21. B. Richard Goodman	25
22. Jake Mackenzie, Director, Surveillance and Analysis Division, U.S. Environmental Protection Agency, Region IX.	26-28
23. Brian O'Neill, Acting Regional Director, Pacific Southwest Regional Office, Heritage Conservation and Recreation Service.	29
24. R.J. Becker	30
Errata Sheet	E-1-E-13



CITY OF YUMA

180 West First Street, 85364

(602) 783-1271

August 15, 1980

Bureau of Land Management
Arizona State Director (920)
2400 Valley Bank Center
Phoenix, Arizona 85073

Subject: Response to "Draft EIS" for "Continued Use of
Public Lands at Luke Air Force Range" received
August 5, 1980.

ARIZONA STATE OFFICE BUREAU OF LAND MANAGEMENT Reg. PTC	
AUG 18 1980	
TO	
FROM	
RECEIVED	
DATE	
BY	
FILE	
NO.	
OF	
AUG 18 1980	
BUREAU OF LAND MANAGEMENT	

RESPONSE: Noted.

Dear Mr. Whittock:

The City of Yuma has no specific comments with respect to the details provided in the Environmental Impact Statement. The City wishes to express its support for continued use of the subject lands for the purpose indicated in the report. The only significant impact on the City is the economic benefit that it derives from the use of those lands by the Marine Corps Air Station and the MCAS presence in the City of Yuma. The City of Yuma is very supportive of the military presence of the Marine Corps Air Station, the U.S. Army's Yuma Proving Grounds, and the Air Force operations on the Luke Air Force Range. Should the Air Force not be granted the renewal of the proposed withdrawal of public lands, there would be a negative economic impact on the City of Yuma.

South Yuma County is presently suffering a 14% unemployment rate which in recent years has been chronically worse than the rest of the state. A withdrawal of the military presence here would make matters worse.

Sincerely,

Severo Esquivel
Severo Esquivel
City Administrator

SE:dd

JIM HARTOGEN
P. O. BOX 84
CASA GRANDE, ARIZONA 85828
PHONE: 808-707
CAPITOL, ENR-5548
1-800-353-6944 (TOLL FREE)



COMMITTEES
NATURAL RESOURCES & ENERGY
VICE CHAIRMAN
AGRICULTURE
COMMERCE
ENVIRONMENTAL AFFAIRS

Arizona House of Representatives

Phoenix, Arizona 85007

THIRTY-FOURTH LEGISLATURE

August 22, 1980

Mr. Chuck Whitlock, Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Whitlock:

Thank you very much for the draft of the Environmental Impact Statement of the Cabeza Prieta National Wildlife Refuge. My comments will be rather brief.

First of all, I can not argue the fact that we must have a strong national defense program. This includes proper training which apparently is done on the Luke Air Force Range. I also realize that with the modern aircraft of today it definitely takes more space than the aircraft of the 1940's. But at the same time I am somewhat confused, and I am sure many of my constituents in the Ajo area share my thoughts, concerning the fact that the refuge was established in 1939 by Executive Order 8038 for the purpose of conservation and development of natural resources; particularly for the protection and management of the bighorn sheep.

I think the problem lies within my last statement. Apparently citizens from the Ajo area have been denied access to the Cabeza Prieta because it would interfere with the development of natural resources and in some way interfere with the life of the bighorn sheep. On the other hand, we allow the Air Force to use part of the Cabeza Prieta, not as a target range but to fly over. Apparently the aircraft create sonic booms and jet noises and many darts that are being toward for the purpose of target practice are falling to the ground.

I would suggest that the portion of the Cabeza Prieta that is being used by the Air Force at the present time be completely turned over to them as part of their gunnery range

Mr. Chuck Whitlock

Page 2

August 22, 1980

or re-establish the Cabeza Prieta according to the original guidelines in Executive Order 8038.

It would seem to me that the Air Force is probably causing more imbalance of the natural resources of the area than people would on an afternoon outing or a picnic. It would also seem that once the Air Force is finished with this particular area, it will be no good for people or animals.

I would encourage the Bureau of Land Management to offer a significant portion of the game preserve for people to enjoy the scenic wonders of the southwest. Once again, I find it redundant to bar people from the game preserve but on the other hand let low flying aircraft that drop objects use the same portion of the land.

I think it would be wise, if you truly want citizen participation, to hold a public hearing in Ajo concerning the draft report of the Environmental Impact Statement. If I can be of any assistance to you in setting up such a meeting, please don't hesitate to contact me.

Sincerely,

JIM HARTOGEN
State Representative

JH/sj

RESPONSE:

2-1

Public involvement is an integral part of the NEPA process, and the public has been provided opportunities for all relevant concerns to be expressed. In addition to publishing notification of the proposed action in the Federal Register, early notification letters were mailed on 26 September 1977 to federal, state and local agencies as well as to individuals and the news media. Public briefings were held in Phoenix on 9 March 1978 and at Ajo on 28 April 1978. The meeting at Ajo was conducted as a result of Honorable Jim Hartogen's 14 December 1978 response to the early notification letter. In each published article and at each meeting, an address was provided where the public could forward their comments. All comments received have been considered in respect to the proposed action and its environmental consequences.

Comment three is a large packet of information titled:

Statement
On Opposition to Withdrawal of Land
by the United States Air Force
Specifically
Those Lands Included in
The Lease and Suspension Agreement
between
Thomas Childs and
The United States Air Force
Prepared by - Clara M. Price
8th March 1978

The total document is not published here, but is on file with ELM and the Air Force at Luke A.F.B.

Also see comment letter 14.

Statement
on
Opposition to Withdrawal
of
Land
by
the United States Air Force

Specifically
Those Lands
Included in
The Lease and Suspension Agreement
between
Thomas Childs Jr.
and
the United States Air Force

prepared by
Clara M. Price
430 Palo Verde Ave.
Ajo, Ar. 85321
8th of March, 1978

*Rec'd
21 Aug 80
State Arch*

AUG 22 1980...

7:45 A.M.

PHOENIX, ARIZONA

August 17, 1980

ARIZONA STATE OFFICE
BUL. LAND MANAGEMENT

AUG 22 1980

7:45 A.M.
PHOENIX, ARIZONA

A 9973 VLL

J. R. Daughen

SP22 E. Holmes

Tucson, Az 85710

Bureau of Land Management

Az State Director (920)

2400 Valley Bank Center

Phoenix, Az 85083

Attention: Director

Re: Continued Use of Public Lands, Luke AFB, Arizona
And Access to Mining Claims

Dear Sir,

My primary interest in the Luke AFB Range is possible mining interests, consisting of some approx 17 mining claims filed over 25 years ago, all adjoining and containing minerals perhaps vital to the national needs. Spectrographic analysis made by A. V. Kerr Laboratories in Hollywood, California in January 1953 showed metallic constituents of Silicon 36%, Titanium 2.4%, Yttrium 1.3%, Columbium 1.5%, Uranium 1.21%, mainly plus other metals, some rare earths, and with a showing of Ytterbium, Phosphorymium, and Dysprosium. I have this analysis plus several others made by the U.S. Bureau of Mines and the U.S. Atomic Energy Commission. I believe some of these minerals are indeed of vital interest to our country, and that some method of access

to them should be and ~~can~~ be worked out so as not to interfere with the military use of the land. I have no quarrel with the A.F. use of these public lands, certainly they must need them, but they are PUBLIC lands, and as such to close them to public use generally seems bureaucratic and unfair. Certainly further total withdrawal will consume an average persons lifetime, thereby depriving many of benefits they should have. The mere fact that unexploded ordinance covers the area like a blanket would in itself take years to correct totally. These afore mentioned claims are not in an area which would conflict with any military action in the range according to your Environmental Impact Statement. I would go on record as being against continued use of these public lands by the Air Force unless some agreement is accorded to grant mineral search and mining in the area even if on a limited basis in non-violent areas. Also, as an added item, the Sinagua Altas southerly region is of some historical value other than big horn sheep. There is an interesting area of Indian rock writings or drawings therabouts of some possible significance.

-3-

It, in the future, the U. S. Geological Survey should be interested. I have a geologist report on the 17 Claims above mentioned made in 1955 by the Associated Engineers and Geologists of Tucson, Arizona. It also contains the assays and spectrographic analysis of minerals in the area.

Thank you for your consideration.

Very truly yours,

J. Hughes

ARIZONA STATE OFFICE
BU. LAND MANAGEMENT

AUG 22 1980

7:45 A.M.
PHOENIX, ARIZONA

RESPONSE:

- 4-1 Continued withdrawal of the LAFR should not restrict mineral development on land beyond the range boundary. Restrictive policy that applies within the range boundary is described on page 67 of the DEIS.
- 4-2 The Air Force is aware of the potential cultural resources in the Tinajas Altas mountains and it is one of the 46 sites identified by the Arizona State Museum (see p. 52 of DEIS). No impact is expected to occur to these resources.

SIGNOFF

major

DMB Approval No. 29-A0218

FEDERAL ASSISTANCE		2. Applicant's application	3. State application identifier	4. Number
1. Type of Action:	☒ Preapplication	☒ Application	AZ	80-80-0050
1. Type of Action:	☐ Notification Of Intent (Opt.)	☐ Report Of Federal Action		
1. Type of Action:	☐ Letter Blank	☐ OCT 17 1980		
4. Legal Applicant/Recipient		5. Federal Employer Identification No.		
a. Applicant Name	Bureau of Land Management			
b. Organization Unit	Arizona State Office			
c. Street/P.O. Box	2400 Valley Bank Center			
d. City	Phoenix	e. County	Maricopa	
e. State	Arizona	f. Zip Code	85073	
f. Contact Person	Clair M. Whitlock, State Director			
g. Name & telephone no.	(602) 261-3706			
7. Title and description of applicant's project		8. Type of applicant/recipient		
Impact Statement Continued Use of Public Lands At The Luke Air Force Range, Arizona		a. Number 1150999		
The U.S. Air Force has applied for a 20-yr renewal of a 502,792 acre withdrawal on the Luke Air Force Range (LAFR) in Arizona. LAFR consists of 2,669,225 acres and includes the Cabeza Prieta National Wildlife Refuge (NWR), which is managed by the U.S. Fish and Wildlife Service. Associated with the proposed withdrawal, the Air Force (over)		b. Title Unknown		
10. Area of project impact (Name of city, county, state, etc.)		c. Dept. of Interior		
Located east-west between Ajo and Yuma, southern Yuma and Maricopa counties and in western Pima Co.		d. Bu. of Land Management		
13. Proposed Funding		e. Type of assistance		
a. Federal \$	.00	b. Applicant	mul.	
c. State	.00	d. Project	mul.	
e. Local	.00	f. Project Duration	Months	
g. Other	1.00	h. Estimated number of persons benefiting	19	
i. Total \$	1.00	j. Estimated date to be submitted to federal agency	19	
20. Federal agency to receive request (Name, city, state, zip code)		21. Remarks added		
		☐ Yes ☐ No		
22. To the best of my knowledge and belief, the information furnished herein is true and correct, and the applicant has been authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is approved.		23. Signature		
24. Agency name		25. Date signed		
26. Organizational Unit		19		
27. Address		28. Application, Year month day		
29. Action taken		29. Federal application identification		
a. Awarded	30. Funding	30. Federal grant identification		
b. Rejected	a. Federal \$	31. Funding data		
c. Returned for amendment	b. Applicant	19		
d. Deferred	c. State	32. Action date		
e. Withdrawn	d. Local	19		
f. Total \$	e. Other	33. Contact for additional information		
g. Total \$	f. Withdrawn	34. Name and telephone number		
		35. Remarks added		
		☐ Yes ☐ No		
36. Federal agency A-95 action		37. Federal Agency A-95 Official (Name and telephone number)		

No Comment Responses from:

- Director, Agriculture and Horticulture
- State Mine Inspector
- Executive Director, Pima Association of Governments
- Administrator, Arizona Power Authority

RESPONSES: Noted.



United States
Department of
Agriculture

Soil
Conservation
Service ARIZONA STATE OFFICE
BU. LAND MANAGEMENT

3008 Federal Bldg.
230 N. First Ave.
Phoenix, AZ 85025

AUG 27 1980

7:45 A.M.
PHOENIX, ARIZONA

August 26, 1980

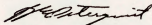
Clair M Whitlock
State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, AZ 85073

RESPONSE: Noted.

Dear Clair:

We have reviewed the draft Environmental Impact Statement on
"Continued Use of Public Lands at the Luke Air Force Range, Arizona."
We have no comments to make on the EIS.

Sincerely,

 For:
Thomas G. Rothenbaugh
State Conservationist



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P. O. BOX 2711
LOS ANGELES, CALIFORNIA 90008

ARIZONA STATE OFFICE BUL LAND MANAGEMENT	
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18	FILE
16	FILE
14	FILE
12	FILE
10	FILE
8	FILE
6	FILE
4	FILE
2	FILE
SEE 11	

SPLED-E

29 August 1980

U.S. Geological Survey phoned in a "No Comment" response to BLN on 8/29/80.

Bureau of Land Management
Arizona State Director (920)
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

This is in response to a letter from your office which requested review and comments on the Draft Environmental Impact Statement (DEIS) for the Proposed Renewal of the Luke Air Force Range.

The proposed plan does not conflict with existing or authorized plans of the Corps of Engineers. We have no comments on the DEIS.

Thank you for the opportunity to review and comment on this document.

Sincerely,

Norman Arno
NORMAN ARNO
Chief, Engineering Division

RESPONSE: Noted.

RESPONSE: Noted.



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

AREA OFFICE, ARIZONA - NEW MEXICO
2953 W. INDIAN SCHOOL ROAD
PHOENIX, ARIZONA 85017
September 2, 1980



ARIZONA STATE OFFICE BUL LAND MANAGEMENT	
SEP 3 '80	
TO:	
FROM:	
SUBJECT:	
REVIEWED:	
TECH. SER.	
MAN. SER.	
PHYS. TNG. CTR.	
CF	
SET ME	10-10

Memorandum

To: State Director, Arizona State Office (920), Bureau of Land Management, 2400 Valley Bank Center, Phoenix, Arizona 85073

From: Area Manager, Phoenix Area Office

Subject: EIS-Continued Use of Public Lands at the Luke Air Force Range, Arizona

We have reviewed the draft Environmental Impact Statement for Continued Use of Public Lands at the Luke Air Force Range, Arizona.

We feel that the impact statement adequately covers wildlife resources and impacts to these resources which will occur from the continued use of this land by the Air Force.

The following specific changes are suggested.

Page 27, 3rd Para, 2nd Sentence.

We suggest this sentence be changed to read "This area was recommended in 1977 by the Sonoran Pronghorn Recovery Team under Section 4 of the Endangered Species Act of 1973 as amended."

Page 48, 6th Para, last sentence.

We suggest the word "has" be omitted from this sentence and the following sentence be added. "A non-jeopardy opinion was issued by the FWS in March 1980."

Page 49, Figure 2-4.

The west boundary of the recommended critical habitat goes due south not angling east as shown on this figure. The attached copy of figure 2-4 gives the approximate boundary as presently recommended.

Page 54, Para 3.

Under current Refuge Management Plans cattle grazing on the Cabeza Prieta NWR will be eliminated as of March 1981.

We appreciate the opportunity to comment on this draft.

Richard L. Morgan
Richard L. Morgan

Attachment

cc: Regional Director (ES), Region 2, Albuquerque, New Mexico
Field Supervisor, Ecological Services, Phoenix, Arizona
Office of Environmental Coordination, Washington, D. C.

RESPONSE:

9-1 Text changed, see errata sheet item 20a.

9-2 Text changed, see errata sheet item 28b.

9-3 Figure 2-4 has been revised to reflect the correct boundary location.

9-4 Text changed, see errata sheet item 31.



United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

430 GOLDEN GATE AVENUE, BOX 14063
SAN FRANCISCO, CALIFORNIA 94112

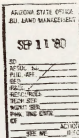
IN REPLY REFER TO:

L7619 - ELM

X W46

(WR) REQ

September 8, 1980



RESPONSE:

10-1

It is recognized that under adverse wind conditions a very limited number of darts could drift onto the Organ Pipe Cactus National Monument. Air combat training operations in the South-eastern portion of the Cabeza Prieta NWR could generate sonic booms that may be heard on the Organ Pipe Cactus National Monument, however, overpressures would be extremely small and should sound somewhat like distant thunder. Page 12 of the final Environmental Impact Statement for Proposed Wilderness on the Organ Pipe Cactus National Monument recognized the existence of the air-to-air operation associated with the Luke AF Range but the EIS does not identify the operations as being an impact on the Monument or its designation as wilderness. The discussion provided in item 37b. of the errata sheet describes mitigation measures which should diminish impacts on the Organ Pipe Cactus National Monument. In respect to low altitude operations over the Monument, these operations are associated with the Sells MOA which is not a part of the LAFR. Readers are directed to the Sells MOA DEIS for more definite information.

10-2

Text changed, see item 31 of errata sheet.

10-3

See response to Comment 10-1.

10-4

See response to Comment 10-1.

10-5

Text changed, see item 44 of errata sheet.

Memorandum

To: State Director, Bureau of Land Management, Phoenix, Arizona

From: **ACTING**
Associate Regional Director, Resource Management and Planning

Subject: Review of draft environmental impact statement, for continued use of public lands at the Luke Air Force Range, Arizona

We have reviewed the subject document and offer the following comments:

1. Page 1, paragraph 4: Reference is made to low-level overflights, sonic booms, and towed-target debris as they relate to the Cabeza Prieta proposed wilderness. These same problems apply to the 312,600-acre existing wilderness with Organ Pipe National Monument and also detract from the monument's visual resources. During the preceding year, park employees, assisted by student volunteers, removed seven of the aerial dart row targets described on Page 56 from within our wilderness zone, and we have documented frequent low-level over-flights and sonic booms. Suggest you include reference to Organ Pipe wilderness.
2. Page 54, paragraph 2: No burros are known to occur within the lands administered as Organ Pipe Cactus National Monument. The last burros were removed in early 1978.
3. Page 67, paragraph 6: See subparagraph 1, above.
4. Page 72, paragraph 5: We suggest also that an effort be made to prevent darts and other ordinance from being dropped within the Monument.
5. Page 95 (terms), Public Land: The definition should not be limited to lands administered by the Bureau of Land Management. All land management by local, state, and Federal governments are considered "Public Land".

Since we feel that the subject proposal has a direct influence on the area under our management, we appreciate the opportunity to comment on the draft document.

John Williams



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 30TH COMBAT SUPPORT GROUP (TAC)
DAVIS MONTHAN AIR FORCE BASE, AZ 85027



SEP 17 1980

REPLY TO
ATTN OF

DEEV (Mr Poole, 5295)

SUBJECT:

Luke Air Force Range Withdrawal: Draft Environmental Impact Statement

TO:

Bureau of Land Management
Arizona State Director (920)
2400 Valley Bank Center
Phoenix, Arizona 85073

We concur in your assessment of the subject withdrawal.


GORDON E. MOORE, P.E., Chief
Engineering & Environmental
Planning Branch

RESPONSE: Noted.

SEP 18 5 15 PM '80
RECEIVED
11/10/80

Readiness is our Profession

September 19, 1980

ARIZONA STATE OFFICE
BU. LAND MANAGEMENT

SEP 22 1980

7:45 A.M.
PHOENIX, ARIZONA

Mr. Clair Whitlock
State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, AZ 85073

Dear Mr. Whitlock

On behalf of EARTH FIRST, a national wilderness preservation group, I would like to make the following comment on the draft environmental impact statement for the proposed renewal of Luke Air Force Range.

We believe that the area encompassed by Luke Air Force Range, including Cabeza Prieta National Wildlife Refuge, is an area of international significance for its wilderness and natural values. Despite the impacts of the military use, the area remains one of the most pristine in the United States and one of the most ecologically sound outside of the polar regions.

In large part it is the military withdrawal that has served to protect this magnificent expanse of wilderness Sonoran Desert from the destructive impacts of modern man, including grazing, mining, highways, powerlines, and off-road-vehicle use. The military withdrawal can continue to give important protection to the area.

However, the military use has also had an impact and could, if not properly restrained and managed, have such an impact in the future to significantly lessen the wilderness and natural values of the area.

Therefore, EARTH FIRST supports the following:

1. Continued withdrawal of the entire Luke Air Force Range from mining, grazing, oil and gas leasing, non-military development, and most public use.
2. Expansion of Cabeza Prieta Wildlife Range to include all of Luke Air Force Range (overlapping designations for the entire 2,669,225 acres. This will provide for better on the ground management for wildlife, wilderness, and natural values by the US Fish and Wildlife Service of the entire ecosystem.
3. Judicious management by DoD and USFWS to minimize the impact of military activities on the ground. Protection of the wilderness, wildlife, and natural values of the area should enter into all military programs to as great a degree as possible.
4. All military programs that have ground impacts (such as requiring construction, etc.) should be conducted on the periphery of the area or moved to other ranges. In particular, the Marine Corps' Mobile Land Target (MLT) should

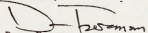
be removed from Luke Range and transferred to another area not as susceptible to damage as the fragile desert. A dry lake bed (such as Willow) would seem appropriate.

5. The entire area, except for the developed areas on the periphery, should be recommended for designation as part of the National Wilderness Preservation System with appropriate special management considerations for the military activities.

6. The Republic of Mexico should be encouraged to protect their lands (Pinacate and Gran Desierto) that are adjacent and which form a part of this unparalleled desert wilderness.

Thank you for this opportunity to comment.

Sincerely


Dave Foreman
Member of the Circle
EARTH FIRST
PO Box 38
Glenwood, NM 88039

RESPONSE: Noted.



BRUCE HARBITT
DIRECTOR

Arizona
State Land Department

1524 WEST ADAMS
PHOENIX, ARIZONA 85007



OFFICE OF
STATE LAND COMMISSIONER

ARIZONA STATE OFFICE	
BU. LAND MANAGEMENT	
SEP 22 '80	
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RESPONSE: Noted.

September 19, 1980

Bureau of Land Management
Arizona State Director (928)
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

The Arizona State Land Department appreciates the opportunity to review the Draft Environmental Statement regarding the continued use of Public Lands at the Luke Air Force Range, Arizona.

A cursory review of Departmental records indicate approximately 80,000 acres of State Trust land lie within the Luke Air Force Range (LAFR) mostly within Yuma County. The indication of numerous unrecorded burial sites for unexploded ordnance throughout the Range virtually precludes the use of State Trust lands due to the potential safety hazard. This coupled with the fact that the LAFR is proposed for continued use in military training operations on a long-term basis appears to constitute an irreversible land use commitment.

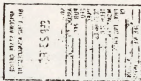
In view of this, the Bureau of Land Management, Department of Interior, at some future date, may want to consider a land exchange of the State Trust lands within the boundaries of the LAFR.

Sincerely,

Joe T. Fallini
Joe T. Fallini,
Commissioner

JTF/RBO/tb

To Whom It May Concern:



Dear Sir,

This letter is being written in protest against the 20 year renewal of the Luke Air Force Range, by the Childs Family.

Art Town
They feel the Air Force has had the land long enough. The Childs Family was here before the Air Force Range was established. They were here running cattle, fixing wells, drilling wells for water, protecting the wildlife, taking care of the land, not destroying it, like the Air Force did.

14-1
The Childs family lives on a ranch along side the L.A. F. R. boundary and have been harassed numerous times, about going through the north gate. They even pulled a gun on one of the daughters of Phillip Childs and his grand kids. They is the Air Force personnel that check the target, fence gates and other jobs they have. This gate lies on the other side of the 10 mile bridge, going north on Interstate 8. This gate lies 4 miles from the nearest target and at no time does the road they use, lead in the direction of the target. This harassment is not necessary and will not be tolerated any longer.

The Air Force closed off grazing rights, wells that had plenty of water, that the family use to use for cattle grazing in that area, south of the Suncada Mountains.

The Air Force no longer needs all this land. There is no war and if there was

it would be a Nuclear War. Plasma would be useless in this type of war. The only type of war, that this plasma can be used, would be a sealed down war like the Korean Conflict, Vietnam and even then, there is too much opposition for the United States to get involved in another conflict like the one national.

The Air Force maintains that the pilots be combat ready. That is fine but who told them that if there is a conflict the terrain would be the same, as the one they have been using for 39 years.

The Childs family have numerous mining claims and historical value on that range. Its time that the Air Force give back what they used for practicing, before they cause any more damage. They fly too low and cause some booms, that have damaged Mr. Phillip Childs house windows.

We, the Childs Family, feel that there is too much land already restricted from public use or grazing. Its time we started getting some of it back. The town of Ajo and our patent land included is surrounded by restricted land. There is the Cabeza Prieta Wildlife Refuge, west of Ajo, the Organ Pipe National Monument south of Ajo, The Papago Indian Reservation to the east and the Luke Air Force Range to the North. We are surrounded and have no place to go for recreation.

We the Childs Family as Indians, want our land back. We have suffered long enough and are tired of it. You think that you

while people can do anything you want and get it. You are mistaken, because we will fight in court to the very end. Our ancestors use to roam that land, "known as the Lake Air Force Range", and live off that land.

You people come in and want to keep renewing it and renewing it, no that is enough 39 years is long enough.

It is just like the drift, always drifting people, what for? There is no war anymore so they stopped the drift.

The Air Force wants to keep on practicing, go practice somewhere else leave Arizona alone. No dictory somebody's else land, see if they let you. We don't want you in here anymore, enough is enough.

Signed,

Phillip Childs

RESPONSE:

14-1

Concerns expressed in this letter do not involve the land to be withdrawn under the Air Force's proposed action. The questioned land is a portion of a withdrawal granted to the Air Force under Public Land Order (PLO) No. 652, dated June 28, 1950 (see Figure 1-2 of FEIS errata sheets for location of the land). The Air Force has been trying to resolve the right-of-way issue with a member of the Child's family since 1977. The family's historical interest in the land is recognized. The AF position has been that access could be obtained by signing a hold-harmless agreement and notifying Air Force authorities when access is needed. The Air Force is reviewing operations in the questioned part of the LAWR. The review will include the need for continued use of this portion of the withdrawal granted under PLO-652. The Child's family will be advised of any change in status which may be proposed as a result of this review.



Arizona
State Land Department
1624 WEST ADAMS
PHOENIX, ARIZONA 85007

ARIZONA STATE OFFICE
PUBLIC LANDS SUPERVISOR

SEP 25 '80

TO: _____
FROM: _____
SUBJECT: _____
ACTION: _____
DATE: _____
BY: _____
RE: _____
DATE: _____
BY: _____



September 24, 1980

Mr. Clair M. Whitlock,
Arizona State Director
Bureau of Land Management
2400 Valley Center
Phoenix, Arizona 85073

Dear Mr. Whitlock:

The staff of the Arizona State Land Department has reviewed the Draft Environmental Impact Statement, "Continued Use of Public Lands at the Luke Air Force Range, Arizona", and offers the following comments for your consideration.

1. The document appears to adequately describe the historic and current impacts relating to the use of the Luke Air Force Range.
2. The proposed action does not appear to significantly alter the current impact associated with the current use of the range and is supported by this Department.
3. The Gila Bend Natural Resource Conservation District has long been interested in the recreational use of an area within the Crater Range. Although this is not a part of the study, it appears that mention and consideration of this activity is in order.
4. Where State Trust lands are involved in the Range, it is assumed that they will receive the same care and attention as is indicated on the public lands.

Thank you for the opportunity to comment.

Sincerely,

Kelly G. Johnson
Kelly G. Johnson, Director
Division of Natural Resources

KRJ:rey/nhk

RESPONSE: Noted.



United States
Department of
Agriculture

Soil
Conservation
Service

3008 Federal Building
230 North First Avenue
Phoenix, Arizona 85025

September 17, 1980

Bureau of Land Management
Arizona State Director (920)
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

We have reviewed the draft environmental impact statement for the proposed renewal of the Luke Air Force Range and have the following comments:

The description of soils is not adequate. In the first paragraph it states, "average grain-size composition is 30 percent gravel, cobbles, and boulders; 40 percent sand; 25 percent silt; and 5 percent clay." It is extremely difficult to describe 2,669,225 acres by an average grain-size composition. We would suggest (a) use the information from the general soil map, or (b) do an adequate soil survey of the area.

I am enclosing for your information and use the General Soil Map reports for Maricopa, Pima, and Yuma Counties, Arizona. Even though these reports are useful for general planning only, they are still more valuable than the description of soils on page 41.

The enclosed General Soil Map report should be included as references on pages 97-99.

We appreciate the opportunity to review the environmental impact statement.

Sincerely,

Richard S. Benson

Thomas G. Rockenbaugh
State Conservationist
Attachment

cc:
Douglas Pease, SSS, SCS, Phoenix, AZ

RESPONSE:

16-1

It is recognized that the discussion on soils would be improved if soil surveys were conducted; however, the cost for these surveys in relationship to the size of the range is cost prohibitive. Data used was from surveys conducted specifically for the MX program on the LAFR and is considered sufficient for analyzing impacts from continued use of the range. The general soils map will be included in the document to provide as much data as is possible.



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE

Two Embarcadero Center, Suite 530
San Francisco, California 94111

September 23, 1960

HED-09

ARIZONA STATE OFFICE
BU. LAND MANAGEMENT

SEP 26 '80

SD _____
ASSOC SD _____
PLM AFF. _____
EEO _____
PLAC. I _____
RESOURCES _____
TECH SER _____
Mgmt SER _____
PUB. TRNG CTR _____
CF _____

_____ ACTION
_____ SEE ME INFO

RESPONSE:

17-1 New figures 1-2 and 1-3 are provided in the errata section of the FEIS.

Bureau of Land Management
Arizona State Director (920)
2400 Valley Bank Center
Phoenix, Arizona 85073

Gentlemen:

We have reviewed the Draft Environmental Impact Statement for the proposed renewal of the Luke Air Force Range in Maricopa, Pima, and Yuma Counties, Arizona, and provide the following comment.

Figures 1-2 and 1-3 are difficult to read and should be clarified. The identifying labels of the various areas outlined are circled and crosshatched. The crosshatching covers up the label making review difficult. Other than this comment, we do not foresee any problems associated with highways.

We appreciate this opportunity to review the subject Draft EIS and would like to receive a copy of the Final Statement when it becomes available.

Sincerely yours,

Neil Dillabough, Director
Office of Environment and Design

BRUCE BABBITT, Governor

COMMISSIONERS:
C. GENE TOLLE, Phoenix, Chairman
WILLIAM W. BEERS, Prescott
CHARLES F. ROBERTS, O.D. Bisbee
FRANK FERDINSON, JR., Yuma
FRANCES W. WERNER, Tucson

DEPUTY DIRECTOR:
ROBERT A. JANTZEN

DEPUTY DIRECTOR:
ROGER J. GRUENEWALD



ARIZONA GAME & FISH DEPARTMENT

2222 West Johnny Road Phoenix, Arizona 85023 942-5000

September 30, 1980

Mr. Clair M. Whitlock, State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

RE: Draft Environmental Impact
Statement - Continued Use
of Public Lands at the Luke
Air Force Range, Arizona

Dear Mr. Whitlock:

The Arizona Game and Fish Department has received and reviewed the referenced Draft Environmental Impact Statement (DES). The Department has several concerns regarding the document's content; therefore, comments are provided by specific section or part thereof.

The Department does not believe that the wildlife portion under the "Description of the Existing Environment" is adequate or complete. The DES should include descriptions of the populations and ranges for mule deer, white-tailed deer, and several special interest species, i.e., the flat-tailed horned lizard (*Phrynosoma m'calli*), the fringe-toed lizard (*Uma notata*), and the Rosy boa (*Lichanura trivirgata*). These species are significant within the Luke Air Force Range (LAFR).

Furthermore, the Department does not believe that the wildlife portion under the "Environmental Impacts of the Proposed Actions" complies with the provisions of Section 40 CFR 1502.16(d), which states that the discussion will include "the environmental effects of alternatives including the proposed action." The comparisons under Section 1502.14 will be based on this discussion. Therefore, this section should provide sufficient discussion to evaluate the various alternatives.

Page 49, Figure 2-4

The western boundary of the recommended critical habitat area for Sonoran antelope proceeds north from

Mr. Clair M. Whitlock
Page 2
September 30, 1980

the International boundary to Interstate 8 along the range line between townships 20W and 21W, and not as shown in this figure.

Page 50, Paragraph 1, first sentence

The Department recognizes two subspecies of desert bighorn sheep as occurring in the State--*Ovis canadensis nelsoni* and *O. c. mexicana*--but only certain populations of the Mexican subspecies are considered "threatened".

Page 50, Paragraph 1, third and fourth sentences

In the third sentence--"Concentration of the species is approximately one per 100 square miles."--there should be a reference cited for the concentration of Yuma mountain lions. The extrapolation in the fourth sentence--"thus the LAFR supports some 40 mountain lions."--yields an unrealistic figure for the total number of lions on the LAFR, even if the estimate of one lion per 100 square miles is realistic. There is considerable habitat diversity in an area as large as LAFR, with some habitat much more suited to mountain lions than other habitat. This statement also fails to account for the concentration of wildlife to varying degrees around sources of free water. Further, there is not sufficient knowledge about the Yuma mountain lion on LAFR to make a definite statement that the area supports 40 lions.

Page 50, Paragraph 2

"The habitat of the desert bighorn sheep is restricted to the mountains (figure 2-5)." This statement is untrue. Bighorn sheep seasonally inhabit valley floors away from mountains. In Figure 2-5, referenced in the above quote, the cross-hatched area is defined in the legend as, "...areas where Desert Bighorn Sheep are normally found on the Luke Air Force Range." This legend contradicts the statement in the text that bighorn sheep are restricted to the mountains.

Further on in this paragraph, there is a statement that reads, "Three sheep were harvested, as opposed to the normal 62-210 sheep harvested (Phelps, 1977, 1978, 1979)." The figures of 62-210 sheep normally harvested are grossly in error and contradict the preceding sentence which makes reference to a "...normal annual issue of 10 to 15 permits." There has not been an annual harvest of even 62 bighorn sheep on the area covered by the Luke Air Force Range in documented history.

Mr. Clair M. Whitlock
Page 3
September 30, 1980

18-8 References to information on wildlife resources from the Arizona Game and Fish Department are all listed as personal communications. There is much published information available from the Department, which would provide references regarding the wildlife resources which could be scrutinized by the interested public. Such references should be used in order that the environmental impact statement comply with the provisions of Section 40 CFR 1502.24 of the "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act", which in part states the environmental impact statement "...shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement."

In summary, the Department believes that the DES is inadequate in providing information on the wildlife resource that occurs on the LAFR. Further, the size and diversity of the LAFR warrants a more in-depth discussion of the impacts associated with the renewal of the withdrawal by the Department of the Air Force.

Since the LAFR has a diversity of species (both floral and faunal), several of which are of special interest, the Department would support any studies in this area that would help to more accurately determine the range and density of these special elements, and also to determine if the range activities are having any detrimental impacts on them.

Thank you for the opportunity to review and comment on this document.

Sincerely,

Robert A. Jantzen, Director

William E. Werner
William E. Werner
Habitat Evaluation Specialist
Yuma Regional Office

WEW:dm

cc: Planning and Evaluation Branch, Phoenix

RESPONSE:

- 18-1 The 1980 Arizona Game and Fish Department wildlife distribution maps indicate a sparse population of mule deer and isolated sightings of white tail deer on the eastern portion of LAFR.
- 18-2 The lizards and the Rosy boa are present in the extreme southwest corner of the LAFR as shown in the Peterson Field Guide Series, A Field Guide to Western Reptiles and Amphibians, Robert C. Stebbins, Riverside Press, Cambridge, 1966.
- 18-3 The DEIS was completed and filed with EPA under the former CEQ guidelines because much of the documents preparation and coordination had been accomplished before the new CEQ regulations had been adopted. Regardless of format, we consider the analysis of environmental impacts of alternatives to be commensurate with the actual feasibility of those alternatives.
- 18-4 Figure 2-4 has been modified as required.
- 18-5 According to the Arizona Game and Fish Department publication Threatened and Unique Wildlife of Arizona, October 21, 1978 the entire subspecies of the mexicana variety is listed in the Group III category. The publication states Group III species in Arizona may be in jeopardy in the foreseeable future.
- 18-6 A total of 40 lions represents the maximum estimate provided by the Arizona Game and Fish Department State Office. The average population on the LAFR may be 15 to 20.
- 18-7 Although the habitat of the desert bighorn sheep is generally restricted to the mountain areas, they do migrate to the valley floor areas near the mountains.
- The typographical error on the number of sheep harvested has been corrected, see item 29 of the errata sheet.
- 18-8 See response to Comment 18-3.

October 3, 1980

Mr. Clair M. Whitlock
Bureau of Land Management
Arizona State Director (920)
2400 Valley Bank Center
Phoenix, AZ 85072

RE: Comments Regarding the Luke Air Force Range

Dear Mr. Whitlock:

I wish to comment regarding the environmental impact from Air Force usage of those public lands involved. I am speaking from the experiences of having traversed the Devils Highway (Ajo to Papago Well to Tule Well - exit via Tacna or Tinajas Altas) numerous times over the past 10 years. My interest involves the experience of the pristine nature of the desert during the winter months and camping therein.

The Air Force range usage has had the following effects that I would like to call to your attention:

1. Many "dart" targets litter the area. These could easily be removed.
2. The Air Force usage of the range prevents traversing the Devils Highway during the week. Friday's 5:00 p.m. ingress time constraint limits the desert experience because of the time/distance factors. Noon Friday termination of use of Cabeza Prieta NWR would allow better public use.
3. Over the past four years I have not been able to exit via Tinajas Altas because "usage by the Marines" of that area. This fact should be so noted and I would like an explanatory reply if this area is ever available for public use.

Other than these considerations, I believe the range usage by the Air Force is a legitimate and necessary use of public lands.

Sincerely,

Bryan V. Cady, Jr.

Bryan V. Cady, Jr.
8035 N. 2nd Street
Phoenix, AZ 85020

ARIZONA STATE OFFICE BU. LAND MANAGEMENT	
OCT 3 '80	
TO	_____
FROM	_____
SUBJ	_____
INFO	_____
FILE	_____
RECEIVED	_____
DATE	_____
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BY	_____
FOR	_____
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RESPONSE: Noted.

Barbara Goodwin with the U.S. Bureau of Mines in Washington, D.C. phoned in a "No Comment" response on October 3, 1980.

RESPONSE: Noted.

constitutes an acceptable and legitimate use of public lands.

Sincerely,

B. Richard Goodman

B. Richard Goodman
157 N. Country Club Drive
Phoenix, AZ 85014

October 3, 1980

Mr. Clair M. Whitlock
Bureau of Land Management
Arizona State Director (920)
2400 Valley Bank Center
Phoenix, AZ 85072

Dear Mr. Whitlock:

The purpose of this letter is to respond to the request for comments regarding the draft Environmental Impact Statement for continued use of public lands at the Luke Air Force Range (LAFR) located in southern Arizona.

During the past eight years, I have made several trips into and through the Cabeza Prieta National Wildlife Refuge, which is contained within the area designated as LAFR. These trips have primarily used the Devil's Highway route, Ajo to Papago Well, to Tule Bank, exiting via Tinajas Altas or Tacna. These trips have been extremely rewarding for me, both from the standpoint of enjoying the Sonoran desert in its natural state, as well as the ability to share the feelings of what it must have been like when the early Spanish explorers originally entered the area.

Regarding the call for comments, I would like to make the following:

1. Current administration of access to the range under approved permits calls for entry starting at 5:00 p.m. on Fridays, and exit by 8:00 a.m. on Mondays. Because of the time and distance involved, I feel that this limits the experience of the area, as well as creating some logistics problems for those of us who seek to enter the area, such as attempting to negotiate the often difficult terrain under cover of darkness. My recommendation would be to change the timing of entrance to noon on Fridays, with the requirements to be off the range by Sunday at 10:00 p.m. In fact, this would add an additional 10 hours of night time flight operations for the military.
2. Many tow targets have been spotted during my trips into the area. I feel that the various military users of the range could be more diligent in spotting and removing the downed targets, thereby preserving the pristine nature of the Sonoran desert.

Other than the above comments, I feel that the use of the range

RESPONSE: Noted.

ARIZONA STATE OFFICE BUREAU OF LAND MANAGEMENT	
OCT 3 '80	
SD	_____
ASD	_____
DEPT. ATT.	_____
SEC.	_____
PLANT	_____
PROSPECTS	_____
TECH. SER.	_____
WATER RES.	_____
PHOTO. UNIT	_____
OFF.	_____
REC. MGMT.	_____
INSTR.	_____

1. The DEIS discusses the use of the Mobile Land Target (MLT) (pg. 28). The FEIS should address the soil erosion impacts of the use of this vehicle and measures which could be implemented to mitigate effects, and alternatives to the use of the vehicle itself or accompanying dragging target sled.
2. The DEIS does not adequately discuss measures taken to mitigate impacts of target site preparation, maintenance, and attendant EOD with respect to soil erosion. The FEIS should include the effects of these activities on quality of surface waters and groundwater and measures to be taken to mitigate impacts.
3. It is unclear if the 9,500 acres presently in use and the proposed additional 3,300 acres represent land area which is impacted by ordnance delivery practice and testing or by ordnance disposal activities (pg. 64). In addition, there is some inconsistency in the acreage which is described as being subject to possible environmental damage. On page 65, a figure of 330,000 acres is given while page 85 indicates that 380,000 acres would be affected. The FEIS should clarify both issues.

- 22-7 4. The FEIS should fully discuss measures to safeguard riparian habitat. Additionally, procedures should be presented which would enforce the ban on ordnance delivery or testing within one mile of waterholes, springs, wells, and tanks (pg. 22).
- 22-8 5. The DEIS does not adequately discuss future water demands at LAFR and Gila Bend APAF and the resultant impacts on groundwater quantity and quality. The FEIS should include measures for groundwater protection and include water conservation measures to be used at both installations.

Noise Comments

- 22-9 1. The DEIS notes that noise impacts are included in various chapters under the heading of Hazards and Safety. The FEIS should address noise as a separate element and include a more detailed discussion of this subject.
- 22-10 2. The DEIS does not adequately address the effects of noise on the population of the Sells Area (the Papago Indian Reservation). Page 15 mentions low altitude training routes near the Papago Reservation as having been previously described in a draft EIS (U.S. Air Force, 1979). The primary range for air-to-ground sorties is presented in the noted EIS as being located just west of the Sells Airspace. The report further describes units from various Air Force bases combining low-level navigation with air-to-ground attack training into one training sortie. In light of all the proposed activity, the FEIS should include the analysis and mitigation for noise for that area.
- 22-11 3. The DEIS, on pages 60 and 61, attempts to explain the aircraft noise exposure to an individual standing beneath a low-level flight by the OSHA standards. While it is understood that this explanation is restricted to the land under withdrawal consideration, these standards apply to employees and are dissimilar to noise standards developed to protect the health and welfare of the general public in a residential community. The FEIS should adequately address the problem of noise, aircraft noise, low-level entry/exit aircraft noise, and high level aircraft sonic booms and the impacts of this problem on the adjacent land and population.

EIS CATEGORY CODES

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EI--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

RESPONSE:

- 22-1 The no action alternative identifies the questioned portion of the Green Belt Planning Unit as Area C and indicates that this designation, in the absence of withdrawal would allow the land to be opened for mineral leasing and mining activities. A differential impact cannot be estimated because it is not known to what extent mineral development would occur. It seems probable that any mineral development activity would have a greater impact than present use.
- 22-2 The DEIS (p. 20) gave recognition to EPA hazardous waste regulations; however, the discussion was on the proposed rules. Item 17b. of the errata sheet provides update on the May 19, 1980 final regulation and states the Air Force is committed to compliance with the requirements.
- 22-3 Due to the environment of the LAFR, ordnance on the surface and subsurface experience little to no deterioration after long term exposure to the elements. Thus, the environmental impact on ground water would be insignificant and of such a low magnitude that it was decided to eliminate any discussion in the impacts section. See p. 22 of the DEIS for additional and related discussions.
- 22-4 Erosion impacts from using the MLT and other military operations (including target maintenance, construction, and EOD operations) are provided on page 64 of the DEIS. Mitigation measures within the military's ability are discussed on page 71 of the DEIS. We have no alternative to using some type of MLT because this training is considered essential. The two MLT maneuvering areas have been selected for minimum impacts.
- 22-5 Mitigation measures within the military's ability are provided on page 71 of the DEIS. Impacts identified for soils and watershed from operations on the range were reviewed in respect to surface and subsurface water quality. The impacts are negligible as indicated on page 64 of the DEIS. Any additional discussion would be of an academic nature and not have any practical effect on decision making.
- 22-6 The 9500 acres and 3,300 acres discussed represent total acres of impacts from past and future operations, respectively. See Table 1-5. The second paragraph on page 85 of the DEIS has been deleted (see item 42 of errata sheet), thus, eliminating any confusion in the number of acres for target facilities and the number of acres involved in EOD operations.
- 22-7 A defined riparian habitat is not considered to exist on the LAFR. Prohibition of bombing activities on the Cabeza Prieta has been achieved by the removal of air-to-ground targets from the Refuge.
- 22-8 There is no significant increase projected water use. As explained on page 64 of the DEIS, military consumption represents only 1.5 percent of the dependable supply and 0.3 percent of the aquifer depletion. There are already strict conservation measures in effect at Gila Bend and LAFR and they will be continued due to economic reasons. Any impact on the quantity or quality of the ground water will depend almost entirely on usage by others than the Air Force.
- 22-9 It is realized the present format does not allow full discussion of all attributes under one topical heading; however, the data is in the EIS and is considered an adequate review for the proposed continuation of withdrawal of this unpopulated land.
- 22-10 The LAFR and Sells airspace complement each other; however, they are two separate and independent entities. If the LAFR did not exist there would be no substantial difference in the number of training flights conducted in the Sells airspace. The combining of air-to-ground training on LAFR with navigation sorties over the Papago Indian Reservation will not affect the noise environment of the latter. Impact of operations on the LAFR do not extend to the Papago Reservation.
- 22-11 Impact of LAFR operations are limited and contained within range boundaries, except some sonic boom noise may be heard (like distant thunder) in the Organ Pipe Cactus National Monument. The people exposed would be a few recreationists, FWS and military personnel. Community noise guidelines developed by EPA or those criteria developed by the Department of Housing and Urban Development (24 CFR 51) are not considered adequate descriptors for the noise environment on the LAFR since there are no residential areas to be impacted. In absence of any other adequate descriptor system, the OSHA criteria was cited to provide the magnitude of the impact. At the described level, it is anticipated recreationists may be annoyed by the noise but no hearing loss would be expected.



HERITAGE CONSERVATION AND RECREATION SERVICE
PACIFIC SOUTHWEST REGION
SAN FRANCISCO, CALIFORNIA 94102
450 Golden Gate Avenue, Box 35062

PSW 200
DES-80/48

OCT 7 1997

Memorandum

To: State Director, Bureau of Land Management, Arizona

From: *Acting* Regional Director, PSWRD

Subject: Review of Draft Environmental Impact Statement for the
Proposed Renewal of the Luke Air Force Range

We have reviewed the subject document and offer the following comments for your consideration.

We commend the Air Force for previous and ongoing efforts to minimize harm to cultural resources. A copy of the cultural resources management plan (page 66), now being developed, should be provided to our Interagency Archeological Services Division-San Francisco for review and comment when it is completed.

We suggest that the range clean-up program proposed on page 67, to improve the quality of visual resources in the area, be adopted as a mitigation measure to the proposed action.

A number of natural areas identified in the Mojave-Sonoran natural region theme studies¹, have been suggested as potential National Natural Landmarks. These sites, including the four identified on page 26 of this environmental statement which are proposed for designation as natural areas by the Arizona State Parks Board, may warrant protection and restricted military activity. Copies of landmarks briefs and maps are enclosed for the following sites:

Wachter, B.G., W.B. Bull, and S.J. Reynolds. 1976. The Mojave-Sonoran Natural Region Study. University of Arizona-Department of Geosciences.

Martin, P.S. 1979. A Survey of Potential Natural Landmarks, Biotic Themes, of the Mojave-Sonoran Desert Region. University of Arizona-Department of Geosciences.

ARIZONA STATE OFFICE
BUL. LAND MANAGEMENT

OCT 9 '80

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SEE ME ACTION
INFO

Aquilla Mountains
Baker Tanks and Chaotic Sediments
Cabeza Prieta-Tordillo Mountain
Growler Mountain Scarp and Cuesta
Heart Tank Contorted Granite
Pinta Sands and Playas
Raven Butte
Sheep Mountain Study Area

Consultation with this Regional Office may be appropriate in order to develop protection measures for these potential National Natural Landmarks.

Brian O'Neill

Enclosures

RESPONSE:

23-1

With regard to Natural Areas, we recognize the value of these areas and the need for protection and preservation. We are willing to protect and restrict admittance in these areas to the maximum extent possible, within the limits of the resources available to us. However, designation as a State Natural Area or Federal National Natural Designation must include provisions to insure the military mission and activities currently being conducted over and on IAFB, will be allowed to continue. We will continue to require archaeological surveys and environmental assessments whenever major construction is planned on the range.

811 W. 17th Place
Tempe, AZ 85281
October 10, 1980

Bureau of Land Management
Arizona State Director
2400 Valley Bank Center
Phoenix, AZ 85073

Dear Director:

I have looked at the DEMS for Use Of Public Lands by Luke AFB.

Specific justification is not presented for the extent of area;
not for the uses described for Cabeza Prieta NWR.

A review of the uses at CPNWR could be usefully made at this
renewal occasion.

Respectfully,

R. J. Becker
R. J. Becker

RECEIVED
B.L.M. AZ STATE OFFICE

OCT 14 1980

7:45 A.M.
PHOENIX, ARIZONA

RESPONSE: Noted.

ERRATA SHEET

1. Page i, Summary:
 - a. Para 3, 3d sentence - forgone should read foregone.
2. Page V - Table of Contents
 - a. Chapter 1, last entry, Future Operations should read Future Range Improvements.
3. Page vii - List of Figures:
 - a. Number 1-6, title should read Gila Bend Air Force Auxillary Field (AFAF).
4. Page 1 - Purpose:
 - a. Third paragraph, 5th and 6th sentences delete "Environmental Engineers."
5. Page 3, Location and History:
 - a. Second paragraph, replace 4th sentence with: "Included within the boundaries of LAFR are approximately 825,440 acres of land managed by the U.S. Fish and Wildlife Service. This acreage represents 96 percent of the total 860,000 acres of the Cabeza Prieta National Wildlife Refuge."
6. Page 4 - Location and History:
 - a. Fifth paragraph, second line, change to read: "...growing need for a bombing and gunnery range."
7. Page 5, Table 1-2:
 - a. Under "Acreage" column tenth entry, place an asterisk (*) beside the entry "17,131."
 - b. Under "Acreage" column, thirteenth entry, place an asterisk (*) beside "485,661."
 - c. Below the line at the bottom of Table 1-2, add: "* Represents acreage of proposed continued withdrawal."
8. Page 7, 8: Maps on these respective pages have been revised and are attached to the "ERRATA" sheet.
9. Page 9, Existing Operations and Site Conditions:
 - a. Third paragraph, fourth line - delete "banned." Add "Restricted."

10. Page 10. Existing Operations and Site Conditions:

a. First paragraph, Users of the Range, add this sentence between first and second paragraphs. "Infrequent users include the 484th Transportation Battalion (Army Reserve), 107th Tactical Control Squadron (ANG) and the 82nd Airborne Division (U.S. Army). These units use the range to conduct small scale exercises to enhance their military capability."

b. Third paragraph, 6th line. Change "centralized" to read "centralized."

c. Fifth paragraph, Manned Air Force Ranges, delete first sentence. Add, "Only training type (inert) ordnance is used on the manned ranges of the Gila Bend complex."

11. Page 11. Existing Operations and Site Conditions:

a. Third paragraph, Unmanned Air Force Ranges, first sentence change to read, "With the exception of targets 116 (North TAC), 311 (East TAC), and 205 (South TAC), inert....."

b. Fourth paragraph, Unmanned Air Force Ranges, change the first sentence to read "Live ordnance expended against targets 116, 205, and 311 include 250 and 550 pound general purpose bombs; 100 pound fire bombs; 10,20 and 30mm high explosive ammunition and 2.75 inch rockets."

c. Eighth paragraph - Electronic Warfare (EW) Range, line 5, change "antiorcraft" to read "anti-aircraft."

12. Page 12, Figure 1-4:

a. Add under "NOTES" the following, "3. There are a NWD and Applied Tactics Target on the left side of the range (mirror image of the right side). These have been omitted from the drawing to allow more descriptive pictorials of the dimensions."

13. Page 13, Existing Operations and Site Conditions:

a. First paragraph, Air to Air Range, second line, change "missile" to read "missile."

b. Fourth paragraph, Rakish Litter Target Complex, line 9, the figure "100" should read "1000."

c. Fourth paragraph, Rakish Litter Target Complex, add the following after the last line, "(See figure 1-3 for location of the Rakish Litter Target Complex.)"

d. Fifth paragraph, delete this paragraph in its entirety.

14. Page 14, Existing Operations and Site Conditions:

a. Sixth paragraph, "West Coast Air Combat Maneuvering Range (WCACMR)", should read "West Coast Tactical Aircrew Combat Training System (WCTACTS)."

b. Sixth paragraph, 4th line, change the acronym "WCACMR" to read read "WCTACTS."

c. Sixth paragraph, 4th line, change the acronym "WCACMR" to read "WCTACTS."

d. Sixth paragraph, fifth line, change the acronym "ACMR" to read "WCTACTS."

e. Sixth paragraph, line 8, change the number "16" to read "20."
Change the acronym "WCACMR" to read "WCTACTS."

f. Seventh paragraph, line 6, change "admisory" to read "advisory."

g. Seventh paragraph, last sentence, delete. Add the following:
"Ordnance deliveries and scoring are done electronically, thus no ordnance is dropped from the aircraft during these missions. Recently added to WCTACTS is the SHRIKE air-to-ground anti-radiation missile training capability. While utilizing the same instrumental tracking system for aircraft, a captive (ordnance is unable to be launched from the aircraft) SHRIKE missile with inert rocket motor and warhead is carried on the aircraft. The SHRIKE responds to radiated RF energy from a strategically placed emitter located on the range floor. A visual presentation of target and impact footprint are displayed and recorded for aircrew debriefing of all simulated shots. These missions do not expend ordnance."

15. Page 15, Existing Operation and Site Conditions:

a. Second paragraph, Range Use, third line change ".... the Gila Bend Segment/R2302E/R2305.", to read ".... the Gila Bend Segment/R2301E/R2304/R-2305."

b. Second paragraph, Range Uses, lines 6 and 7. Add a period after ".... 5 days a week." Delete the remainder of this sentence.

c. Second paragraph, line 8, after the phrase "... 5 days a week,....," add "... with the ability to expand to 7 days a week if necessary to meet training requirements."

16. Page 19, Existing Operations and Site Conditions:

a. Third paragraph, Range Decontamination and Residue Disposal, change the last sentence to read, "The manned ranges also receive a 5 year (EOD) clearance in which the entire range, involving about 7500 acres, is surveyed."

b. Fourth paragraph, line 3, change "surfact" to read "surface."

c. Fourth paragraph, line 4, change the acronym "(EOD)" to read "personnel."

d. Fifth paragraph, second sentence, change to read "No attempt is made to locate and remove explosive ordnance that may have buried itself underground except on the strafe targets where clearance is done to control ricochets."

e. Fifth paragraph, line 5, the acronym "EOD" should be preceded by the phrase "... explosive ordnance disposal...."

f. For clarity, the 5th paragraph should be inserted between paragraph 2 and 3.

17. Page 20, Existing Operations and Site Conditions:

a. Second paragraph, line 2, change "Air Force" to read "Gila Bend."

b. Third paragraph, delete the 2nd and 3rd sentences. Add the following, "No local regulations restrict disposal at the selected site, but the Environmental Protection Agency (EPA) has published (FR Vol 45, No 98, 19 May 1980) final rules on hazardous waste which require hazardous waste disposal facilities be permitted. These final rules become effective on 19 November 1980. The State of Arizona has also promulgated (Article 18 - Hazardous Waste, May 2, 1980) regulations comparable to EPAs and also become effective on 19 November 1980. The Air Force is committed to compliance with both programs."

c. Fifth paragraph, line 1, change "...9.38 - caliber..." to read ".38 caliber."

18. Page 23. Interrelationships:

a. Second paragraph, first line, change "HAVE HOST IS...." to read "HAVE HOST was."

b. Second paragraph, line 6, change "... is still in progress" to read "... was completed in June 1980."

c. Fourth paragraph, line 6, change "equipment years." to read "....equipment yards."

d. Sixth paragraph, line 1, change "directly" to read "directly."

19. Page 24. Interrelationships:

a. Second paragraph, line 7, delete the next sentence after, "...now paid for by DOD."

20. Page 27, Future Operations:

a. Third paragraph, line 4, change "Section 7" to read "Section 4"

b. Change the title "Future Operations" to read "Future Range Improvements."

21. Page 28, Future Operations:

a. Change the page header at the top of this page to read "FUTURE RANGE IMPROVEMENTS" vice "FUTURE OPERATIONS."

b. Insert new paragraph d:

"d. No Drop Bomb Scoring (NDBS): Associated with WCTACTS, a NDBS capability will be added in mid CY 1981. This capability allows for bomb drop training without expending ordnance. Simulated bomb trajectory will be calculated utilizing aircraft state vector information at simulated separation derived from WCTACTS. All real time flight and calculated information will be recorded for aircrew debriefing."

22. Page 35, climate:

a. First paragraph, line 2, delete second sentence.

b. First paragraph, line 5, change "Winter high...." to read, "Daytime winter....."

c. Second paragraph, line 6, insert in parenthesis "(Fugro National, Inc., 1975)" between ".... western portion." and "strong winds....."

22A. Page 43, Water Rights:

a. Delete first paragraph and replace with the following. " On 12 June 1980, the Arizona Groundwater Management Act was signed into law. This Act established the Department of Water Resources which now has the responsibility to regulate water rights and develop long-range water management plans for the State."

23. Page 37, Table 202:

a. In the column "Oxidants" change the letter entries for Pima and Maricopa counties to read "C" vice "A".

24. Page 38, Air Quality:

a. First paragraph, line 2, change the word "below" to read "better than".

25. Page 39, Air Quality:

a. First paragraph, line 5, change the word "would" to read "...may not...."

b. First paragraph, line 10, delete the words "...or below...."

c. Second paragraph, line 2, insert the word "are" between "...air quality...." and "...range maintenance...."

26. Page 41, Soils and Watershed:

a. Seventh paragraph, line 2, change the word "Coaser...." to read "Coarser..."

27. Page 46, Wildlife:

a. Third paragraph, Threatened or Endangered Plants, line 2, change the word "Most...." to read "None...."

b. Third paragraph, line 3, delete the word "not" between "...plants have..." and "...been afforded...."

c. Fourth paragraph, delete in its entirety.

28. Page 48, Wildlife:

a. Sixth paragraph, line 7, change "Section 7" to read "Section 4..."

b. Sixth paragraph, line 8, delete the word "has" between "...Air Force...." and ".... requested...."

c. Sixth paragraph, last sentence. Add the following: "A non-jeopardy opinion was issued by the FWS in March 1980."

28A. Page 49: Map as illustrated has been revised and included as an attachment to the "ERRATA".

29. Page 50, Wildlife:

a. Second paragraph, line 6, change "62-210 sheep" to read "6 - 10 sheep."

30. Page 53, Cultural Resources:

a. Second paragraph, add to end of last sentence, "Data recovery has been completed at both sites."

b. Sixth paragraph, Land Use, line 2, change the number "1,540" to read "1,740."

31. Page 55, Map of Arizona Metal Mines, Figure 2-6, is replaced, see attachments to the "Errata Sheet".

32. Page 60, Table 2-8:

a. The projected 1980 total personal income for Phoenix and Tucson has been transposed. Phoenix should read "4,012.00" and Tucson should read "879.50".

33. Page 60, Hazards and Safety:

a. First paragraph, first sentence should read "The main hazard associated with the use of LAFR is range contamination from unexploded ordnance."

b. First paragraph, add at the end of the first sentence, "Noise from aircraft using the range may be annoying to some people."

34. Page 65, Vegetation:

a. Seventh paragraph, 4th line, change the word "...some..." to read "....strafe....." Delete the words "...clear the area and....."

35. Page 69, Hazards and Safety:

a. First paragraph, delete lines 1 and 2 and the word "...noise." on line 3.

36. Page 72, Vegetation:

a. Second paragraph, line 4, change the word "consturction" to read "construction."

b. Fifth paragraph, Wilderness, add the following after the last sentence. "A recently completed study of this problem in August 1980, resulted in the movement of the Aerial Dart firing pattern approximately 30 miles north of the previous location. The pattern has also been reoriented to a more east-west direction. These changes should reduce the number of Darts that ultimately impact in the Cabeza Prieta NWR and Organ Pipe National Monument. Dart employment procedures were also revised to reduce the impact of Darts on IAFR."

37. Page 79, Irreversible and Irretrievable Commitments of Resources:

a. Second paragraph, Land Use, line 5, change the word "Buried..." to read "Buried..."

38. Page 81, Alternatives to the Proposed Action:

a. Third paragraph, Alternative 1, line 2, change the number "1,502,792." to read "502,972".

b. Third paragraph, Alternative 1, line 6, change "West Coast Air Combat Maneuvering Range" to read "West Coast Tactical Aircrew Combat Training System."

c. Fifth paragraph, in the list of Air to Ground units, the fourth entry should read "162TFTG" vice "16TFTG."

d. Fifth paragraph, in the list of Air to Air units, delete the fourth entry "82FTW, Williams AFB."

39. Page 82, No Action:

a. Sixth paragraph, Impacts on the Human Environment, change the word "withdrawn" to read "withdrawn."

40. Page 84, Alternative #2:

a. Fifth paragraph, first line, delete the first word "Begin..."

b. Fifth paragraph, second line, insert the word "be" between "...could..." and "...eliminated..." and add the words "... some of ..." after the word "sacrificing."

41. Page 85, Alternative #2:

a. Second paragraph, delete.

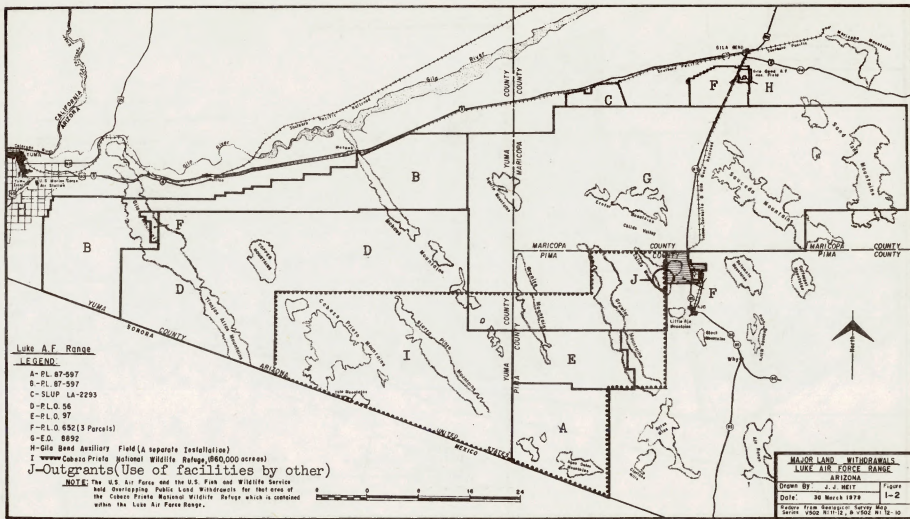
42. Page 93, Glossary:

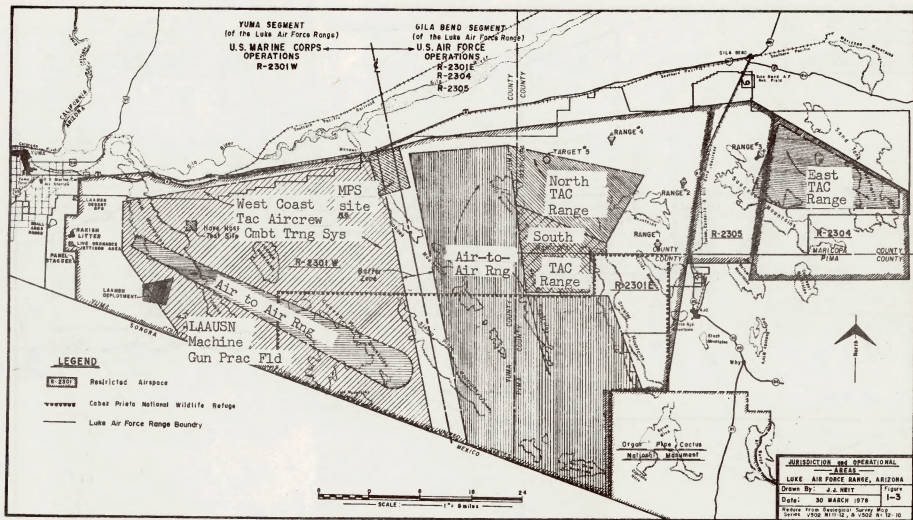
a. The 32nd entry "TTL", does not have an explanation. Add the following, "Tactical Training Luke."

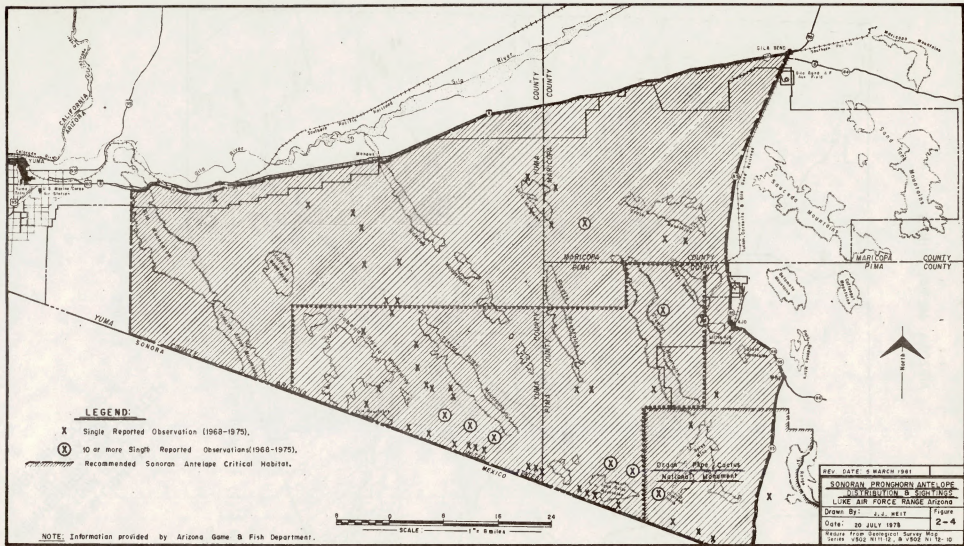
b. The 34th entry, "WCACMR" delete in its entirety. Replace with "WCTACTS" West Coast Tactical Aircrew Combat Training System."

43. Page 97, References:

a. Delete the entry, "Chavis, Albert, 1979, etc"







ARIZONA METAL MINES

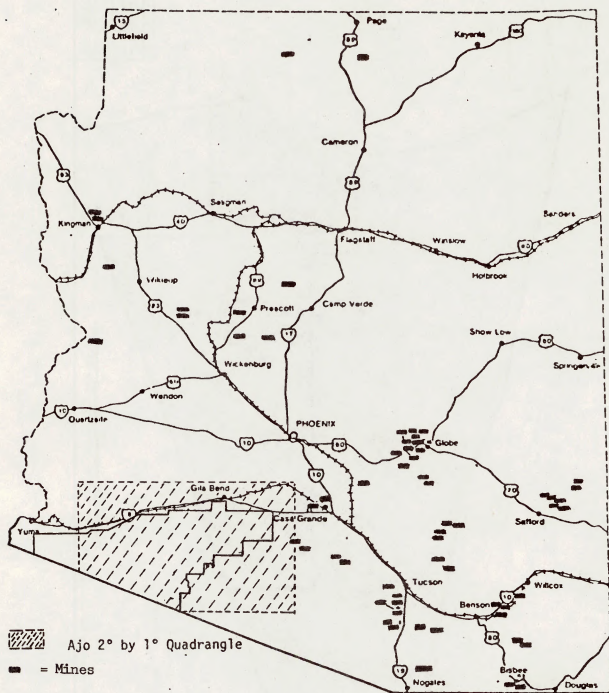


FIGURE 2-6

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